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Attorneys for Defendant

GOOGLE LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF JOINT
LETTER BRIEF RE NOTICE ISSUES**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Action Filed: July 14, 2020

Trial Date: February 10, 2025

1 I, EDUARDO E. SANTACANA, declare that:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 with the law firm of Willkie Farr & Gallagher LLP, located at 333 Bush Street, 34th Floor San
4 Francisco, California 94109, counsel for Defendant Google LLC (“Google”) in the above-
5 captioned action. Unless otherwise stated, the facts I set forth in this declaration are based on my
6 personal knowledge or knowledge I obtained through my review of corporate records or other
7 investigation. If called to testify as a witness, I could and would testify competently to such facts
8 under oath.
9

10 2. I submit this declaration in support of the Parties’ Joint Letter Brief Re: Notice
11 Issues filed herewith.
12

13 3. Attached hereto as Exhibit 1 is a true and correct copy of an excerpt from the
14 transcript of the deposition of David Monsees taken in this litigation on September 15, 2022.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct.
17
18

19 Dated: March 7, 2024

/s/ Eduardo E. Santacana

Eduardo E. Santacana